



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 85-101 – Regulations Governing the Licensure of Radiologic Technology Practitioners; Department of Health Professions

March 4, 1999

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 9-6.14:7.1.G of the Administrative Process Act and Executive Order Number 25 (98). Section 9-6.14:7.1.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the proposed regulation

The Board of Medicine proposes to update its Regulations Governing Radiologic Technology Practitioners to include the following substantive changes:

- A requirement that all educational programs that train radiologic technologists—limited be directed by a radiologic technologist with a master's degree and current American Registry of Radiologic Technologists (ARRT) certification and that all courses be taught by a licensed radiologic technologist or by a licensed doctor. There are currently no accreditation requirements for these educational programs.
- The addition of an examination requirement for a radiologic technologist-limited license and procedures for reapplying after unsuccessful attempts to pass the examination.

- The clarification that mammography may only be performed by a fully licensed radiologic technologist.
- The elimination of a provision that allows for application fees, minus a \$25 processing fee, to be refunded if the application is withdrawn. It is the policy of the Department of Health Professions (DHP) that all submitted fees are non-refundable.
- A provision that unlicensed radiologic technologist graduates be allowed to continue their traineeship for 14 days following receipt of unsuccessful licensure examination results. Current regulations require immediate termination.

Estimated Economic Impact

Examination and Educational Program Requirements for Limited Licenses

In response to growing concerns about the minimal requirements for obtaining a radiologic technologist-limited license, the proposed regulations establish standards for educational programs to ensure that the specified hours are taught by qualified instructors and require that all applicants pass the national examination for the Limited Scope of Practice in Radiography offered by the ARRT. The cost of the examination is \$35 and it is currently offered only three times a year (although the ARRT expects to have the exam computerized and available daily by the year 2000) which may delay licensure for some individuals who complete their coursework earlier. The Virginia community college system offers programs that meet the proposed standards for \$212 to \$371, depending on the number of anatomical areas in which the student chooses to be trained.¹

The proposed changes in licensure requirements appear to be consistent with current national standards. In at least one area, however, Virginia requirements do not conform to the standards recommended by the American Society of Radiologic Technologists, which do not provide for limited practitioners to be licensed to perform radiographic procedures of the

¹ Data provided by the Virginia Department of Health Professions. Cost figures are from Tidewater Community College.

abdomen and pelvis, or for bone densitometry. For this reason, there are no ARRT examinations for these specialty areas.

The Board believes requiring full licensure for these radiographic practice areas would impose an undue and unnecessary burden on certain medical offices and create a shortage of qualified personnel in areas of the state where full licensure programs are not easily accessible. In an attempt to ensure competency, the proposed regulation states that applicants for bone densitometry and for practice in the abdomen and pelvis areas must submit a notarized statement from a licensed radiologic technologist or doctor of medicine or osteopathy attesting to the applicant's training and competency in those areas. The applicant is also required to have successfully performed a specific number of procedures under the direct supervision and observation of the attestor.

These standards are not expected to reduce the current availability of training programs as the Board is not aware of any programs operating at this time that do not meet the proposed requirements. On the other hand, the new requirements will provide employers, consumers (patients), and the state licensing board with a readily available, legally defensible measure of minimum competency for individuals seeking to provide limited radiographic procedures. The Board expects that the proposed standards will increase the quality of care provided, reduce the risk from exposure to radiation for both the patient and the practitioner, and help to ensure that quality information is presented for diagnosis. However, there is no evidence available to estimate the effectiveness of the new education and examination requirements, therefore the magnitude of any potential benefits is unknown at this time. Nevertheless, the additional costs to applicants are not very high so it may be reasonable to expect these changes to result in a net economic benefit for Virginia.

Other Changes

The proposed regulation clarifies that only a fully licensed radiologic technologist may perform mammography. This clarification should not alter current practice, as it is consistent with the federal Mammography Quality Standards Act passed in 1992.

Elimination of the application withdrawal fee refund will increase the costs for applicants who change their mind. However, the applicant does cause DHP to incur costs associated with the licensure process and it is appropriate that the applicant should pay those costs. The repeal of this provision will transfer costs from other licensees to the applicant. There are not expected to be any economic efficiency consequences associated with this change.

The addition of a 14-day window for unlicensed radiologic technologists to reapply to sit for a second examination is designed to improve the administration of the regulation is not likely to have any significant economic impacts.

Businesses and entities affected

The proposed changes to this regulation will affect all applicants for a radiologic technologist-limited license, approximately 125 to 150 individuals per year, as well as all programs that provide training for radiologic technologists-limited.

Localities particularly affected

The proposed educational program standards are not expected to reduce the current availability of training programs and hence, should not affect the supply of radiographic technologists-limited in any areas of the state.

Projected impact on employment

The proposed regulation is not expected to have any significant impact on employment in Virginia.

Effects on the use and value of private property

The proposed regulation is not expected to have any significant effect on the use and value of private property in Virginia.

H:\REGS\EO13\EIAS\DHP\DHP1246.doc